

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

<b>BEVERLY B. MARTIN, as next friend of KHALID MOUTON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION NO. 5:23-cv-4 (MTT)</b>
	)	
<b>AHMED HOLT, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**STANDARD REQUIRED DISCLOSURE OF THE EXISTENCE OF VIDEO OR  
PHOTOGRAPHIC EVIDENCE (modified)**

Because of recurring issues of disclosure and retention of recorded evidence, the Court will enter a standard disclosure order in appropriate cases. That order has been modified for this case. Counsel for defendants shall comply as directed.

Counsel for the defendants shall confer with the defendants and with appropriate Georgia Department of Corrections (“GDC”) staff and no later than 30 days from the date of entry of this Standard Required Disclosure file the following disclosures:

- (1) Plaintiff complains about events that occurred at Georgia State Prison (“GSP”). State whether, in January 2021, GSP had stationary or mounted cameras in the unit or area where Plaintiff was housed.
- (2) If so, state whether those cameras recorded the events alleged by Plaintiff, whether those recordings have been preserved, and the identity of the custodian of the recordings. If the recordings have not been preserved, explain in detail why.
- (3) State whether body-worn or handheld cameras recorded the events alleged by Plaintiff, whether those recordings have been preserved, and identify the custodian of the recordings. If the recordings have not been preserved, explain in detail why.

- (4) ~~If Plaintiff complains of a use of force (either anticipated, spontaneous, or unanticipated) as that term is defined in the GDC Standard Operating Procedure, Use of Video Recording Equipment, Policy No. 204.11 and GDC Standard Operating Procedure, Use of Force and Restraint for Offender Control, Policy No. 209.04, identify the custodian of any recordings of the events alleged. If there are no available recordings, explain in detail why the events were not recorded or, if recorded but no longer available, why the recordings were not preserved.~~
- (5) Identify all GDC employees contacted to gather the information required by this disclosure.

Counsel is directed to preserve all recordings. **Failure to do so may result in the imposition of sanctions.**

**SO ORDERED**, this 17th day of October, 2023.

S/ Marc T. Treadwell  
MARC T. TREADWELL, CHIEF JUDGE  
UNITED STATES DISTRICT COURT